

# Franciscan Health System

November 1, 2007

Yvette Fox, Rules Coordinator  
Certificate of Need Program  
Department of Health  
310 Israel Rd. SE  
Tumwater, WA 98501

Dear Ms. Fox:

The Franciscan Health System (FHS), a four hospital system serving Pierce and South King Counties appreciates the opportunity to comment on the Department's proposal to change the current nursing home bed to population ratio from 40 beds per 1,000 residents age 65+ to 40 beds per 1,000 residents aged 70+. While the FHS is, in general, an advocate of the State's policy of encouraging community based alternatives over nursing home care; we are concerned that insufficient data collection and analysis has occurred to determine what the appropriate ratio should be to ensure a balanced and accessible long-term care delivery system.

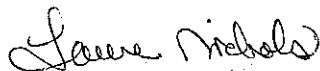
Because our hospitals run at some of the highest occupancy levels of any in the State, and our emergency rooms regularly operate at or in excess of capacity, we are pressed on a daily basis to find appropriate and timely discharge options for patients. Increasingly, we are finding that more and more patients under the age of 65 need post-acute inpatient care. We also struggle to find placement for medically complex patients and patients with co-morbid behavioral and psychiatric needs. We are well aware that simply allowing for more nursing home beds may not solve our most pressing needs. However, we understand that a blanket change in the ratio would close the door to any new beds in the region for nearly ten years. FHS believes that a more prudent approach is necessary.

As such, we are requesting that the ratio not be adjusted until a study can be conducted and consensus reached on what the appropriate ratio should be. We also strongly advocate for rules that would allow nursing facilities that agree to serve complex and other hard to place patients and/or special population groups are provided the ability to apply for and secure CN approval even in the midst of a statewide "surplus" of beds. Without an adequate supply of appropriately staffed and equipped nursing facility beds hospitals like those in the FHS system will face increasing delays in discharge, increasing outlier days, and ultimately both the acute and EMS systems will be adversely impacted.

FHS would welcome the opportunity to participate in a regional dialogue which continues to promote community based alternatives but also ensures that the needs of communities and hospitals for appropriate and timely access are addressed. We urge no change to the current rules until this dialogue has occurred.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,



Laure Caillouette Nichols  
Senior Vice President  
Strategic Planning and Business Development



Laurie Brown, RN MN  
Director, Care Management Services

c: Robb Menaul, WSHA

*A mission to heal, a promise to care.*

1717 South J Street P.O. Box 2197 Tacoma, WA 98401-2197  
Phone 253.426.4101 [www.fhshealth.org](http://www.fhshealth.org)